

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22<sup>nd</sup> Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JEFF NARDINELLI  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S MOTION *IN LIMINE* NO. 16**

1 I, Jeffrey W. Nardinelli, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an associate with Quinn  
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC ("Waymo"). I make this  
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and  
5 would testify competently as follows.

6 2. Attached as Exhibit A is a true and correct copy of transcript excerpts from Otto  
7 Trucking LLC's Videotaped 30(B)(6) Deposition of Pierre-Yves Droz, taken on August 22, 2017.

8 3. Attached as Exhibit B is a true and correct copy of LEV\_005019, containing an  
9 excerpt from text messages exchanged between Anthony Levandowski and Seval Oz, and  
10 produced by Levandowski's counsel after the parties met and conferred on August 24, 2017.

11 4. Attached as Exhibit C is a true and correct copy of LEV\_005018, containing an  
12 excerpt from text messages exchanged between Anthony Levandowski and Seval Oz, and  
13 produced by Levandowski's counsel after the parties met and conferred on August 24, 2017.

14 5. Attached as Exhibit D is a true and correct copy of LEV\_005017, containing an  
15 excerpt from text messages exchanged between Anthony Levandowski and Seval Oz, and  
16 produced by Levandowski's counsel after the parties met and conferred on August 24, 2017.

17 6. Attached as Exhibit E is a true and correct copy of transcript excerpts from the  
18 Video-Recorded Deposition Of Chris Urmson, taken on August 24, 2017.

19 7. Attached as Exhibit F is a true and correct copy of Defendant Otto Trucking LLC's  
20 Objections And Responses To Plaintiff Waymo Llc's Second Set Of Common Interrogatories,  
21 filed under seal.

22 8. Attached as Exhibit G is a true and correct copy of Non-Party Anthony  
23 Levandowski's Objections And Responses To Waymo's June 23, 2017 Subpoena To Produce  
24 Documents, Information, Or Objects Or To Permit Inspection Of Premises In A Civil Action.

25 9. Attached as Exhibit H is a true and correct copy of Defendant Otto Trucking LLC's  
26 Initial Disclosures Pursuant To Federal Rule Of Civil Procedure 26(A)(1).

27 I declare under penalty of perjury under the laws of the State of California that the  
28 foregoing is true and correct.

1  
2 DATED: September 13, 2017

/s/ Jeff Nardinelli  
Jeff Nardinelli

3  
4 **SIGNATURE ATTESTATION**

5 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
6 filing of this document has been obtained from Jeff Nardinelli.

7  
8 /s/ Charles K. Verhoeven  
Charles K. Verhoeven  
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